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July 22, 2025

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Christian Waller v. City of New York, et al.,
21 Civ. 209 (LAK)

USDC SDNY
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Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York and Kurwin Klien ("defendants") in the above-referenced matter. The undersigned respectfully writes to request a fifteen (15) day extension of the deadline to file dispositive motions, from July 28, 2025 to August 12, 2025. This is defendants' first such request, although defendants' two prior requests for an extension of time to complete discovery included corresponding requests to adjourn subsequent deadlines. Plaintiff's counsel, Sameer Nath, Esq., consents to this request.

On July 8, 2025, the Court granted defendants' request to extend discovery and granted a corresponding extension for the parties to file dispositive motions until July 28, 2025. See ECF 31. The reason for the instant request is due to a number of pressing deadlines that the undersigned is currently handling, including motion practice previously scheduled in another matter, additional time is needed to sufficiently prepare the papers for defendants' anticipated motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.¹

¹ Additionally, the undersigned is scheduled to be out of the office the week of August 4, 2025.

Accordingly, the undersigned respectfully requests a fifteen (15) day extension of time for the defendants to file their anticipated motion for summary pursuant to Rule 56 of the Federal Rules of Civil Procedure, from July 28, 2025 until August 12, 2025.

Thank you for your consideration herein.

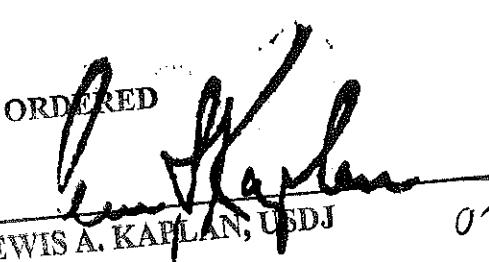
Respectfully submitted,

/s/ Jonathan Hutchinson

Jonathan Hutchinson

Senior Counsel

cc: **VIA ECF**
Sameer Nath, Esq.
Attorney for Plaintiff

SO ORDERED

LEWIS A. KAPLAN, USDJ 07/29/25